

POLICY

It is the policy of the Michigan Department of Human Services Bureau of Juvenile Justice (BJJ) that each facility establishes accountability guidelines for the issuance, distribution, and control of facility access control devices.

PURPOSE

This policy provides for the safety of staff, members of the public, and youths through effective, consistent, and complete control of facility keys and other access control devices.

DEFINITIONS

See JRG, JJ Residential Glossary.

**RESPONSIBLE
STAFF**

Designated in the facility standard operating procedure.

PROCEDURE

Each facility is required to develop and implement standard operating procedures (SOPs) that govern utilization of access control devices. At a minimum, these SOPs must contain all the following requirements:

**Assignment and
Storage**

The facility/center director or designee must approve the issuance, manufacturing, exchange, and duplication of access control devices and changes to locks or doors.

Access control devices are only issued to designated staff.

The assignment of access control devices is documented and annually reviewed.

A key classification system is developed that clearly identifies and describes the appropriate uses of the various keys.

Access control devices are stored in a manner that restricts access and ensures accountability.

**Inventory
System**

An inventory system for access control devices is developed that includes all of the following:

- Code numbers.
- A key ring reference file that identifies the lock or door each key opens.
- The location of locks, doors and rooms requiring access control devices.
- Key rings, including:
 - A written process for the efficient, documented and safe transfer of keys from the staff of one shift to that of another shift.
 - Periodic checking of key rings with prompt notification to the facility/center director or designee in the event of discrepancies.
 - A process for ensuring the immediate return of keys by staff upon their termination or transfer of employment.

Audits

Mandatory documented audits, inventories, maintenance checks and periodic testing of access control devices.

**Off-site
Possession**

At the discretion of the facility/center director or designee:

- Staff are not to take access control devices with them when they leave the facility.
- Staff must immediately notify the facility in the event this occurs.
- If the discovery is made by onsite staff, they will contact the departed staff and direct him or her to immediately return the access control device.

Loss, Theft or Damage

Specific reporting instructions for staff in the event of the loss, theft, misplacement or damage of access control devices, including time-frames. At a minimum, these reports will:

- Indicate time of occurrence or discovery of occurrence.
- Describe surrounding circumstances.
- Specifically identify the key or key ring.

Require the facility/center director or designee to immediately assess and respond to any potential risk in the event of a lost, stolen, misplaced or damaged access control device.

The facility/center director or designee must immediately report lost or damaged access control devices to the BJJ residential facilities director and arrange for a timely repair or replacement.

Youth Access

Youths will not possess keys, access control devices and/or passwords to security systems.

Training

Training on the utilization of access control devices will include:

- Staff responsibility for safeguarding access control devices directly.
- Checking the number of keys on a ring when keys are received.
- Cautioning staff against the following with respect to access control devices:
 - Placing them in areas accessible to youths or leaving them unattended.
 - Throwing or sliding them.
 - Leaving them in locks.
 - Using them for other than their intended purposes.
 - Loaning them to unauthorized persons.

- Unauthorized duplication.
- Altering or defacing them.
- Failing to report locks that are in need of repair or appear to be tampered with.
- Verbally identifying access control devices by number or other identifying information within hearing of youths.

AUTHORITY

Social Welfare Act, MCL 400.115a(1)(l)